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**BOMBARDIER**  
**RECREATIONAL PRODUCTS**

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USCG-98-4734-1

Commandant  
United States Coast Guard  
2100 Second St. S.W.  
Washington D.C. 20593-0001

**Re: Alternative Method of Compliance: 33 CFR Part 183 – Personal Watercraft**

Dear Commandant:

The National Marine Manufacturers Association (**NMMA**) and the Personal Watercraft Industry Association (**PWIA**), recommends that the United States Coast Guard (**USCG**) permit compliance with *International Standards Organization (ISO) 13590* as an *Alternative Method of Compliance to 33CFR Part 183 for Personal Watercraft*. All personal watercraft (**PWC**) manufacturers are currently obligated to seek Grants of Exemption from certain subparts of Part 183 due to product design aspects. The recommended alternative will eliminate the **USCG** processing of **PWC** Grant of Exemption petitions and will ensure compliance with an internationally recognized standard.

The **PWIA** is an affiliate of the **NMMA** organization and membership consists of the five (5) principal **PWC** manufacturers; namely **Arcticcat**, **Bombardier**, **Kawasaki**, **Polaris**, and **Yamaha**. These manufacturers assemble a majority portion of the world's **PWC** production within United States and Canada.

The **PWC** industry has been manufacturing watercraft to **ISO 13590** for a minimum of the past four (4) years. This international standard is technically identical to Society of Automotive Engineers Recommended Practices **J2120**, **J1973**, **J2034**, **J2046**; Electrical, Fuel, Ventilation Systems, and Flotation, respectively. Manufacturer compliance with **ISO 13590** can be ensured by the **NMMA** third-party inspection process, and product identification of such approval via display of **NMMA** Certification Label.

Adopting the recommended alternative compliance method would facilitate the **USCG** commitment towards NAFTA and European/US Mutual Recognition Agreements whereby;

- Canadian federal requirements include ISO 13590 (i.e. TP 1332)
- European Commission is considering amending its Recreational Craft Directive by adopting ISO 13590
- NMMA Third-Party PWC Certification to ISO 13590

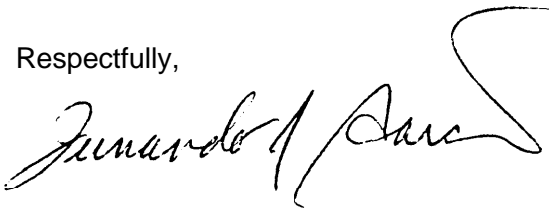
The **33 CFR Part 183** applicability is technically intended for conventional closed-transom boat designs, and did not originally envision the uniqueness of **PWC** design and **construction**. This regulation provides provisions for boat manufacturers to petition the **USCG** for a Grant of Exemption in circumstances where boat design and construction satisfy the intent of the standard and boating safety is not negatively impacted. It is currently necessary that all **PWC** manufacturers petition the **USCG** for Grants of Exemption. During this process, most **PWC** manufacturers cite compliance to the **SAE/ISO PWC** standards.

Attached for your review is the **NMMA PWC** Certification "packet " as well as **ISO 13590**. The undersigned encourages an opportunity to present the **NMMA** Certification program and full explanation of **ISO 13590** to appropriate **USCG** management and technical staff,

Industry has demonstrated a commitment to boating safety by voluntarily developing and implementing a third-party certification process. United States Coast Guard acceptance of the requested alternative method of compliance would further contribute to enhanced boating safety and lessen **USCG** administrative burden of addressing **PWC** Grant of Exemption petitions.

Please do not hesitate to contact the undersigned at **(407) 722 – 4025**.

Respectfully,



Fernando Garcia  
*Chairman, NMMA PWC Certification Committee*  
*Chairman, SAE PWC Subcommittee*

**Cc:** T. Marhevko (NMMA)  
 G. Johnston (PWIA)  
 All **PWC** Manufacturers

FG/bk

Encs.